## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Hearing Date: April 12, 2023 at 1:00 p.m. (ET) Objection Deadline: April 5, 2023 at 4:00 p.m. (ET
Debtors.	(Jointly Administered)
FTX TRADING LTD., et al.,1	Case No. 22-11068 (JTD)
In re:	Chapter 11

## **NOTICE OF MOTION**

TO: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; (g) counsel to the Modulo Entities, Ms. Zhang and Mr. Rheingans-Yoo; and (h) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

On March 22, 2023, the above-captioned debtors and debtors-in-possession (the "<u>Debtors</u>") filed the *Motion of Debtors for Entry of an Order (A) Authorizing the Debtors to Enter into Settlement Agreement with Modulo Capital, Inc., Modulo Capital Alpha Fund LP, Xiaoyun Zhang, And Duncan Rheingans-Yoo, (B) Approving the Settlement Agreement, and (C) Granting Related Relief* (the "<u>Motion</u>").

Objections, if any, to the relief requested in the Motion must be filed with the United States Bankruptcy Court, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801, on or before **April 5**, 2023 at 4:00 p.m. (ET).

At the same time, you must also serve a copy of the objection upon the undersigned counsel so as to be received no later than 4:00 p.m. (ET) on April 5, 2023.

A HEARING ON THE MOTION WILL BE HELD ON **APRIL 12, 2023 AT 1:00 P.M. (ET)** BEFORE THE HONORABLE JOHN T. DORSEY, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5<sup>th</sup> FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

{1368.002-W0070326.}

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

Dated: March 22, 2023

Wilmington, Delaware

## LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown

Adam G. Landis (No. 3407) Kimberly A. Brown (No. 5138) Matthew R. Pierce (No. 5946) 919 Market Street, Suite 1800 Wilmington, Delaware 19801

Telephone: (302) 467-4400 Facsimile: (302) 467-4450 E-mail: landis@lrclaw.com brown@lrclaw.com

pierce@lrclaw.com

-and-

## SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*) James L. Bromley (admitted *pro hac vice*) Brian D. Glueckstein (admitted *pro hac vice*) Alexa J. Kranzley (admitted *pro hac vice*)

125 Broad Street New York, NY 10004 Telephone: (212) 558-4000 Facsimile: (212) 558-3588

E-mail: dietdericha@sullcrom.com bromleyj@sullcrom.com gluecksteinb@sullcrom.com kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession